



**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 20-2

February 4, 2021

In the Matter of TruConnect Communications, Inc. Petition for Limited Designation as an Eligible Telecommunications Carrier in Massachusetts for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households.

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**FIRST SET OF INFORMATION REQUESTS BY THE  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE  
TO TRUCONNECT COMMUNICATIONS, INC.**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable ("Department") submits to TruConnect Communications, Inc. the following information requests:

Instructions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. Unless otherwise stated, each request should be answered in writing and include: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as soon as they are completed.
3. All answers should be filed with the Department by the close of business on Monday March 1, 2021.
4. The term "TruConnect" means TruConnect Communications, Inc. and its corporate predecessors, agents, officers, employees, and assigns.

5. The term “affiliate” means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, TruConnect. For purposes of this definition, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.
6. The term “Petition” means TruConnect’s Application for Limited Designation as an Eligible Telecommunications Carrier filed that the Department received on May 29, 2020.
7. The term “provide complete and detailed documentation” means: provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions TruConnect used in developing the projections or estimates.
8. The term “ETC” means eligible telecommunications carrier.
9. The term “FCC” means the Federal Communications Commission.
10. The term “USF” means Universal Service Fund.
11. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
12. Requests shall be deemed continuing so as to require further supplemental responses if TruConnect and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
13. If any of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

#### Requests

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| D.T.C. 1-1 | Please provide a complete and detailed list of each of TruConnect’s affiliates and provide the names under which each does business.   |
| D.T.C. 1-2 | On pages three and four of its Petition, TruConnect identifies the states in which it and an affiliate had pending ETC petitions as of the date of the Petition. Please provide an update on the status of the referenced petitions. |

- D.T.C. 1-3 Please provide specific metrics demonstrating the financial health of TruConnect and its affiliates such as subscriber counts, financial statements, balance sheets, etc. with respect to both Lifeline and non-Lifeline businesses in Massachusetts and nationally. Please provide any data (e.g., graphs) that demonstrates the connection between the cash flow of TruConnect and the company's offering of Lifeline service.
- D.T.C. 1-4 On page 18 of its Petition, TruConnect states that it has not been subject to enforcement actions or ETC revocation proceedings, and has never had to file for bankruptcy protection. Please confirm that this statement remains true, including actions before both state and federal government entities, and that the same is true for all affiliates of TruConnect.
- D.T.C. 1-5 Identify all states that have rescinded, revoked, or otherwise terminated TruConnect's ETC designation or the ETC designation of any of its affiliates. Provide complete and detailed documentation for each such state.
- D.T.C. 1-6 Identify all states where TruConnect or any of its affiliates has withdrawn a petition for ETC designation. Provide complete and detailed documentation for each such withdrawal.
- D.T.C. 1-7 Identify all ongoing litigation and any litigation within the past ten years involving TruConnect or any of its affiliates. If applicable, provide a copy of all judicial findings made in relation to such litigation.
- D.T.C. 1-8 Certify whether the FCC, any state commission, or any government agency has rendered or entered a finding, conviction (including plea agreements), or civil judgment against TruConnect, its executives or senior managers, or any of its affiliates or their executives or senior managers during the last ten years. Provide a copy of any such finding, conviction, plea agreements, or civil judgment.
- D.T.C. 1-9 Please provide any documentation related to the name change from Telscape Communications, Inc. to TruConnect Communications, Inc. and please explain and provide support for whether the Compliance Plan included as Exhibit 3 is applicable to TruConnect.
- D.T.C. 1-10 Please describe which telecommunications services TruConnect has offered since 1998, and whether any of these services were offered in Massachusetts.
- D.T.C. 1-11 On page 18 of the Petition, TruConnect states that it has provided non-Lifeline wireless service since October 2012. Please indicate where TruConnect is a non-Lifeline provider, and, if not provided in response to D.T.C. 1-3, TruConnect's number of non-Lifeline subscribers.

- D.T.C. 1-12 Please describe how TruConnect plans to market its Lifeline service in Massachusetts and how TruConnect plans to distribute its SIM Cards or handsets to qualified applicants.
- D.T.C. 1-13 Please certify that TruConnect will remit the 911 surcharge to the Massachusetts State 911 Department for each of its Massachusetts Lifeline customers.
- D.T.C. 1-14 On page 21 of its Petition, TruConnect discusses a telehealth pilot under review with the California Public Utilities Commission and its intention to submit a pilot proposal to the FCC. Please a) provide an update on the status of this review; and b) provide an update as to when TruConnect plans to submit its pilot proposal to the FCC if it has not already done so.
- D.T.C. 1-15 On page three of its Petition, TruConnect states that it has been using underlying carriers' networks on a wholesale basis. Please explain whether TruConnect has signed wholesale agreements with these carriers.
- D.T.C. 1-16 Please state whether TruConnect Lifeline subscribers will receive the same network functionality as subscribers to the facilities-based providers TruConnect references.
- D.T.C. 1-17 Please provide a granular map detailing where TruConnect can provide wireless broadband and voice service in Massachusetts and at what strength. The map should clearly show the locations where 3G, 4G, and 5G services are available, and also where TruConnect will not be able to provide service due to lack of coverage from underlying carriers.
- D.T.C. 1-18 Please describe how TruConnect determines which Lifeline subscribers will be assigned to which underlying carrier's network.
- D.T.C. 1-19 Please state whether all handsets brought by subscribers from other providers will be operational with TruConnect's service.
- D.T.C. 1-20 Please explain under which circumstances newly enrolled Massachusetts Lifeline customers must purchase a device versus when TruConnect will provide a device free of charge.
- D.T.C. 1-21 Please state how long applicants should expect to wait between being approved for Lifeline service and receiving or activating a device on TruConnect's network.
- D.T.C. 1-22 Please explain in narrative form what impact the December 1, 2020, increase in Lifeline minimum service standards had or will have on TruConnect's proposed Lifeline service offerings in Massachusetts, including but not limited to the monthly cost to subscribers.

D.T.C. 1-23 Please provide the price of additional minutes and data for TruConnect's Lifeline subscribers.